



DEPARTMENT OF NATURAL RESOURCES

August 11, 2006

Mr. John DeLashmit, P.E.
U.S. Environmental Protection Agency
Region 7
901 North Fifth Street
Kansas City, KS 66101

RE: Permit for California Wastewater Treatment Plant in Lieu of Total Maximum
Daily Load for East Brush Creek (WBID 811)

Dear Mr. DeLashmit:

Approximately one mile of East Brush Creek in Moniteau County near California, Missouri, is on the 2002 303(d) list for Biochemical Oxygen Demand (BOD) and Volatile Suspended Solids (VSS). The source of this impairment is identified as the California Wastewater Treatment Plant (WWTP), Permit Number MO-0023281, which discharges into an unclassified tributary to East Brush Creek. The Missouri Department of Natural Resources (department) has opted to correct this impairment through permit limits in lieu of a Total Maximum Daily Load (TMDL).

The unclassified segment that initially receives the effluent is greater than 0.3 mile from the classified section of East Brush Creek, WBID 811. The impaired waterbody segment is in a rural, undeveloped area. There are no WWTPs upstream of the California WWTP lagoon that would contribute additional BOD to East Brush Creek. The listing for the impaired reaches was based on water quality surveys in 1984, 1992, 1995, 1996, 1997 and 2003 that identified pollution tolerant benthos and significant suspended algae below the lagoon outfall. Eight samples were collected in September 2004, a month when the WWTP does not discharge, identifying low dissolved oxygen (DO) levels in the stream directly below the WWTP. Sixteen samples were taken in June 2005, a month that the facility is discharging, showing impairment of the stream at all five sites due to low DO, high VSS, Total Suspended Solids (TSS) and nutrients. These impacts are judged to be severe enough to exceed Missouri's water quality standards (WQS) for DO and the general criteria for objectionable floating material color and conditions harmful to aquatic life.

The city's permit, with interim and final limits, was reissued on August 4, 2006. The final effluent limitations are:

BOD - 26 mg/L daily maximum and 13 mg/L monthly average;

TSS - 26 mg/L daily maximum and 13 mg/L monthly average;

Ammonia - 3.7 mg/L daily maximum and 1.5 mg/L monthly average for May 1 to October 31;

Ammonia - 7.5 mg/L daily maximum and 3.1 mg/L monthly average for November 1 to April 30;

Total Nitrogen - 8.1 mg/L daily maximum and 4.0 mg/L monthly average;

Total Phosphorus - 0.81 mg/L daily maximum and 0.4 mg/L monthly average; and

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These limits were calculated from wasteload allocations established by the QUAL2E model. The interim limits of 65 mg/L weekly average and 45 mg/L monthly average BOD and 120 mg/L weekly average and 80 mg/L monthly average TSS will remain in effect during construction.

The city is planning an upgrade to their WWTP in order to meet the new limits. The lagoon discharge to East Brush Creek will be eliminated and wastewater will be pumped to the existing south plant. Enclosed please find the draft Missouri State Operating Permit for the California WWTP. The final limits will go into effect August 4, 2009. By meeting these limits, the WQS should be achieved in East Brush Creek and its tributary. In addition, instream monitoring will be required, after the interim period, for DO, temperature, pH, and ammonia. To determine if the new permit limits has eliminated the impairment, the department will schedule ambient stream monitoring within one year of the completion of construction for the new WWTP. The permit also includes a reopener clause to allow for stricter limits if monitoring shows WQS violations.

With this letter, the department submits the California WWTP permit to the U.S. EPA for concurrence that the permit will serve in lieu of a TMDL for the waterbody segments (WBID 811). We appreciate EPA taking prompt action on this matter. If you have any questions, please contact Ms. Mary Clark at (573) 526-1002 or by mail at Missouri Department of Natural Resources, Water Protection Program, P.O. Box 176, Jefferson City, Missouri 65102-0176.

Sincerely,

WATER PROTECTION PROGRAM

Edward Galbraith
Director

EG:mcl

Enclosure

c: Mr. Daniel Schuette, Director, DEQ
Mr. Earl Pabst, Deputy Director, DEQ
Missouri Clean Water Commission